

Decision _____

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

In The Matter of the Application of San Diego Gas & Electric Company (U902G) and Southern California Gas Company (U904G) for a Certificate of Public Convenience and Necessity for the Pipeline Safety & Reliability Project.

Application 15-09-013

**DECISION GRANTING COMPENSATION TO SIERRA CLUB FOR
SUBSTANTIAL CONTRIBUTION TO DECISION 18-06-028**

Intervenor: Sierra Club	For contribution to Decision 18-06-028
Claimed: \$215,424.00	Awarded: \$215,430.50
Assigned Commissioner: Liane M. Randolph	Assigned ALJ: Colette E. Kersten

PART I: PROCEDURAL ISSUES:

A. Brief description of Decision:	D. 18-06-028 resolved San Diego Gas and Electric Company's and Southern California Gas Company's (together, "Applicants") request for a for a Certificate of Public Convenience and Necessity ("CPCN") to build a new 47-mile natural gas pipeline ("Line 3602") from Rainbow Station to Miramar and to reduce the pressure on an existing, smaller transmission line traversing a similar route. The Decision denied both requests. Additionally, the Decision denied the Applicants' request to re-define existing reliability criteria set in in D. 06-09-039.
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B. Intervenor must satisfy intervenor compensation requirements set forth in Pub. Util. Code §§ 1801-1812¹:

	Intervenor	CPUC Verification
Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):		
1. Date of Prehearing Conference:	Sept. 22, 2016	Verified
2. Other specified date for NOI:	n/a	
3. Date NOI filed:	Oct. 19, 2016	Verified
4. Was the NOI timely filed?		Yes
Showing of eligible customer status (§ 1802(b) or eligible local government entity status (§§ 1802(d), 1802.4)):		
5. Based on ALJ ruling issued in proceeding number:	A.17-01-020	Verified
6. Date of ALJ ruling:	May 15, 2017	Verified
7. Based on another CPUC determination (specify):	n/a	
8. Has the Intervenor demonstrated customer status or eligible government entity status?		Yes
Showing of “significant financial hardship” (§1802(h) or §1803.1(b)):		
9. Based on ALJ ruling issued in proceeding number:	A.17-01-020	Verified
10. Date of ALJ ruling:	May 15, 2017	Verified
11. Based on another CPUC determination (specify):	n/a	
12. Has the Intervenor demonstrated significant financial hardship?		Yes
Timely request for compensation (§ 1804(c)):		
13. Identify Final Decision:	D. 18-06-028	Verified
14. Date of issuance of Final Order or Decision:	June 26, 2018	Verified
15. File date of compensation request:	August 17, 2018	Verified
16. Was the request for compensation timely?		Yes

¹ All statutory references are to California Public Utilities Code unless indicated otherwise.

PART II: SUBSTANTIAL CONTRIBUTION:

A. Did the Intervenor substantially contribute to the final decision (*see* § 1802(j), § 1803(a), 1803.1(a) and D.98-04-059):

Intervenor's Claimed Contribution(s)	Specific References to Intervenor's Claimed Contribution(s)	CPUC Discussion
1. Need for Line 3602: A key focus of Sierra Club's advocacy was to put the Applicant's proposed expansion of gas transmission capacity in the context of California's decarbonization objectives.	<i>All citations to D. 18-06-026.</i> Consistent with Sierra Club's emphasis on the importance of contextualizing major new fossil fuel infrastructure investments within California's decarbonization trajectory, the Decision concluded that "Applicants have not shown why it is necessary to build a very costly pipeline to substantially increase gas pipeline capacity in an era of declining demand and at a time when the state of California is moving away from fossil fuels." (Conclusion of Law #3)	D.18-06-028 Verified
Specifically, Sierra Club argued: First, with regard to planning baseline, Sierra Club established through data request and cross examination that the Line 3602 would not be operational until at least 2023. (<i>See</i> Sierra Club cross of Schneider, Tr. p. 149; Sierra Club Opening Br. pp. 4-5)	Page 13: Applicants "agree that the date when the proposed Line 3602 is in service during 2023 is a relevant consideration. Sierra Club agrees." The Decision found that "the earliest date when the proposed Line 3602 would be operational and actually provide purported benefits, is 2023, which is a relevant consideration." (Page 16).	Verified
Sierra Club then noted that by 2023, Applicant's own	Pages 22-23: "Sierra Club also agrees with SCGC's assessment. 'The Sempra Utilities admit that the 'SDG&E system currently has sufficient capacity to meet the Commission's mandated design standards for core and noncore service through the 2035/2036	Verified

<p>gas demand projections showed that even with Line 1600 removed from transmission service, proposed Line 3602 would not be needed to meet the Commission's 1-in-10 peak reliability standards. (<i>See, e.g.,</i> Sierra Club Opening Br. pp. 15-16).</p> <p>Sierra Club further argued that Applicant's gas demand projections were overstated and a pipeline investment that would not be paid off until 2063 should be viewed in the context of California's decarbonization trajectory and declining demand for natural gas. (Sierra Club Opening Br. pp. 5-15).</p>	<p>operating year.” (Sierra Club Opening Brief at 15-16 citing Exh. SDGE-3 at 10: 9-11 Bisi.) Even if 400 MMcf of backbone capacity provided through Otay Mesa is backed out of the equation, ‘Line 3010 has a capacity of 570 MMcf with Line 1600 out of service. The capacity provided by Line 3602 is not needed to meet SDG&E’s forecast of its 1-in-10 year cold day demand in 2023 when Line 3602 would be operational.’ (Sierra Opening Brief at 16.)”</p> <p>Page 14: “Sierra Club emphasizes that the 2015 California Gas Report and the CEC 2016-2017 demand forecast in the 2016 IEPR are the most recent electric forecasts for electric and gas demand and should be used to assess need. Sierra Club claims that these reports overestimate future demand because they do not account for cumulative doubling of statewide efficiency savings required by SB 350. It points out that the CEC has yet to produce any preliminary estimates of an Additional Achievable Energy Efficiency (AAEE) forecast consistent with SB 350. [Sierra] Club questions the extent to which electrical demand of SDG&E’s customers exceeds SDG&E’s import capability for electricity. This translates to how many customers would lose electric service without gas-fired electric generation in San Diego. Sierra Club opines that California’s decarbonization laws are the reason that Line 3602 is not needed. SCGC is sympathetic to Sierra Club’s point of view and suggests that the Commission take official notice of recent updated forecasts such as the most recent</p>	<p>Verified</p>
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	<p>IEPR report. POC endorses Sierra Club's detailed, fact based determination that California's decarbonization efforts are a reason that this project is not needed and why Line 3602 will become a stranded asset if it is built."</p> <p>Page 20, Note 25: "As TURN points out in its Opening Brief at 10, SCGC and Sierra Club have submitted testimonies showing that these forecasts may be too high due to newer demand forecasts and additional energy efficiency and clean energy requirements."</p>	Verified
<p>2. Applicable Reliability Standard/Additional "Resiliency Need":</p> <p>Because proposed Line 3602 was not needed to need the Commission established reliability standard, Applicant's primary justification was the need for pipeline redundancy to purportedly improve resiliency in the event of outage of existing Line 3010. Sierra Club argued that resiliency and redundancy were not synonymous and that Line 3602 would do little to improve system resiliency given that limits on gas supply into the region are the most frequent cause of gas curtailment and that the Commission should not adopt Applicant's proposed resiliency standard. (<i>See, e.g.,</i> Opening Br. pp. 2. 16-17.)</p>	<p>The Decision agreed with Sierra Club's arguments, finding that that "it is reasonable to maintain the 1-in-10 and 1-in-35 cold day standards, which already takes into account the Utility's ability to respond to emergencies. The Applicants fail to prove a standard equating "resiliency" to "redundancy" should be implemented." (pp. 30-31)</p> <p>Page 21: "SCGC, Sierra Club, TURN, and POC also observe that the Applicants admit that Line 3602</p>	<p>Verified</p> <p>Verified</p>

<p>As cited in the Decision, Sierra Club specifically argued that:</p> <ul style="list-style-type: none"> Line 3602 was not needed to meet established reliability standards. Commission precedent did not create a reliability standard beyond the 1-in-10 standard. The Applicant's failed to provide a probability or risk factor for the outage of Line 3010 (which had only occurred once, for a day, without a loss of customer service, in 1985). 	<p>is not needed to meet the Commission's 1-in-10 cold day standard for gas system planning."</p> <p>Decision p. 23: "Sierra Club agrees with SCGC about the 'correct' interpretation of D.06-09-039: 'First, the Commission's 1-in-10 reliability standard already accounts for a reasonable amount of slack capacity.' (Sierra Club Opening Brief at 17.) Sierra Club refers to D.06-09-039 at 26: 'Slack capacity is backbone capacity in excess of demand on the system.' (Sierra Club Opening Brief at 17.) 'On a 1-in-10 cold year peak day in 2023, when demand is expected to reach 563 MMcf/d, 32% of the pipeline capacity will remain unused. 1-in-10 cold year demand is expected to further decrease after 2023, leaving more excess capacity even on peak days.' (Sierra Club Opening Brief at 17.)"</p> <p>Page 26: "Sierra Club asserts, '[t]he Sempra Utilities fail to provide a probability or risk factor for such an occurrence.' (Sierra Club Opening Brief at 2.) Sierra Club asserts historical statistics do not raise any 'red flags' about the potential for repeated outages of Line 3010 or unplanned compression at Moreno Substation. Further, '[t]he Sempra Utilities concede they are not 'aware of any safety issues with Line 3010,' nor do they contend Line 3010 'is near the end of its useful life.' (Sierra Club Opening Brief at 18.)"</p> <p>Page 23: "Sierra Club points to a recent Commission decision in which 'infrastructure investments exceeded established planning</p>	<p>Verified</p> <p>Verified</p> <p>Verified</p>
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<ul style="list-style-type: none"> Commission precedent supported rejection of project's that exceed established planning standards. 	<p>standards.' The Commission rejected a 'refurbishment' contract for an existing gas fired peaker plant in D.17-09-034 <i>Decision in Phase 2 on Results on Southern California Edison Company's Local Capacity Requirements Request for Offers for Moorpark Sub-Area Pursuant to Decision 13-02-015</i>. 'Like proposed Line 3602, the contract was not needed to meet existing reliability standards and therefore could 'on this basis alone' be denied.' (Sierra Club Opening Brief at 16.)"</p> <p>The Decision adopted this reasoning almost verbatim, stating that "Whereas redundancy is merely duplicative, effective investments in resiliency reduce the magnitude and duration of a range of unpredictable events. Because Line 3602 would deliver gas from the same northern receipt point as Line 3010, it would be less effective, in addressing the gas curtailment events the Utilities cite as potentially impacting electric reliability." (p. 32)</p>	
<ul style="list-style-type: none"> Sierra Club explained in its Opening Brief that redundancy does not equate with resiliency: "Whereas redundancy is merely duplicative, effective investments in resiliency reduce the magnitude and duration of a range of unpredictable events. Because Line 3602 would deliver gas from the same northern receipt point as Line 3010, it would 	<p>Page 26 further references Sierra Club's resiliency arguments stating that, "Sierra Club also does not support the Applicants' definition that equates 'resilience' with 'redundancy.'</p> <p>"Moreover the Sempra Utilities' assertions on the need for pipeline redundancy are based on a fundamentally flawed premise: that 'a redundant transmission pipeline enables a gas system to be resilient.' Redundancy does not equate with resiliency. Resiliency is ;the ability to reduce the magnitude and/or duration of disruptive events.' In contrast, redundant is defined as</p>	<p>Verified</p>

<p>be unless in addressing the gas curtailment events the Utilities cite as potentially impacting electric reliability.” (Sierra Club Opening Br., page 2).</p> <p>Additional resiliency arguments made by Sierra Club, including inability of a new pipeline to mitigate for a range of more probable contingencies, and minimal benefit compared to cost, were specifically referenced in the Decision.</p>	<p>‘exceeding what is necessary or normal.’ (Sierra Club Opening Brief at 19.)</p> <p>“It concludes that ‘the redundancy provided by Line 3602 is not an effective [investment] in improving resilience because it would deliver gas from the same receipt point as Line 3010 and therefore is ineffectual at mitigating a range of more probable events that can impact gas delivery to the San Diego Region.’ (Sierra Club Opening Brief at 19.) Based on experience, ‘gas supply resiliency is only as good as the weakest link in the long chain from wellhead to burner tip and making one link redundant does little to improve resiliency.’ (Sierra Club Opening Brief at 20.)”</p> <p>Page 29: “Several parties raise issues regarding the need to balance the benefits of excess capacity versus the impact on ratepayers..... Sierra Club agrees. ‘Indeed, as proposed Line 3602 is a costly new fossil fuel infrastructure investment with a 100-year life as opposed to refurbishment of existing infrastructure, concerns over ratepayer impact and consistency with climate objectives are much more acute.’ (Sierra Club Opening Brief at 17.)”</p>	<p>Verified</p>
<p>3. Alternatives, including electric sector contingency mitigation and</p> <p>gas supply through Otay Mesa:</p> <p>Sierra Club introduced expert testimony and</p>	<p>The Decision agreed. In rejecting Line 3602, the Decision stated that “we encourage the Applicants to identify and propose potential</p>	<p>Verified</p>

<p>argued that other alternatives to address potential pipeline outage would more cost-effective and consistent with California's climate objectives. (Sierra Club Opening Br. 3, 20-24)</p> <p>The Decision specifically referenced Sierra Club arguments to support its conclusions on this topic:</p>	<p>reliability solutions that are more scaled to the scope of the potential problem and consistent with California climate objectives that reduce the risk of an electric outage of Line 3010 or other gas imports. While there are obvious obstacles to overcome in order to accomplish this, options include reconductoring of the 'S line' to improve electric import capability, in-basin stand-alone voltage support, and non-fossil resources (e.g., energy storage)." (Page 32)</p> <p>Pages 29-30: "Sierra Club believes that there are other creative alternatives that the Applicants could pursue despite perceived obstacles. For example, Sierra Club believes the Commission should direct Applicants to work with the CAISO to identify investments consistent with California climate objectives that reduce risk of electric outages in the event of an unplanned outage of Line 3010 or other gas imports. Potential measures include in-basin stand-alone voltage support and non-fossil resources and reconductoring of the 'S Line; to improve electric import capability identified as the San Diego Import Limit or 'SDIT.' 'Because these measures reduce reliance on gas-fired generation, California policy strongly favors these types of investments over the expansion of fossil fuel infrastructure currently contemplated by the Sempra Utilities.' (Sierra Club Opening Brief at 20.)"</p> <p>Page 33: "Gas delivered through Otay Mesa could come from two sources. First, gas from Ehrenberg</p>	<p>Verified</p> <p>Verified</p>
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<p>Sierra Club also highlighted the potential to obtain gas through the existing Otay Mesa receipt point as a viable alternative to Line 3602.</p>	<p>interconnection, on the border of California and Arizona, would flow south along the North Baja Pipeline (NB) until it reaches Mexico, turn west along GDR, and finally be transported North to the interconnection at Otay Mesa on the TGN. This chain of pipelines can be referred to at the NB-GDR-TGN system. Alternatively, LNG purchased from the Costa Azul LNG terminal would flow north along the LNG spur into GDR, and northwest through TGN through Otay Mesa. (Sierra Club Opening Brief at 23, footnote 12.)”</p> <p>Page 36: “Sierra Club asserts that ‘while an RFO for firm capacity is possible, firm capacity has not been necessary for the Sempra Utilities to import gas through Otay Mesa to meet system needs.’ (Sierra Opening Brief at 23.) It also points out the Applicants do not have firm capacity rights on the pipeline system linking gas supply at Ehrenberg to Otay Mesa, yet have scheduled gas through Otay Mesa at least 39 times. (Sierra Club Opening Brief at 23.) Sierra Club agrees with SCGC that there are considerable quantities of interruptible capacity available on the NB-GDR-TGN system and imports could be supplemented with purchases of LNG from the Costa Azul LNG terminal, including several times during February 2011 in response to unexpected cold conditions in the southwest. ‘Accordingly, firm capacity is not ‘critical’ to meeting system reliability needs.’ (Sierra Club Opening Brief at 24.)”</p>	<p>Verified</p>
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	Baja California.”	
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B. Duplication of Effort (§ 1801.3(f) and § 1802.5):

	Intervenor’s Assertion	CPUC Discussion
a. Was the Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates) a party to the proceeding? ²	Yes	Verified
b. Were there other parties to the proceeding with positions similar to yours?	Yes	Verified
c. If so, provide name of other parties: Southern California Generation Coalition (SCGC) was the only other party whose primary focus was the lack of need for Line 3602. The primary focus of the testimony of other parties, including ORA, and The Utility Reform Network (TURN), and Protect our Communities Foundation (POC), was on safety issues related to Line 1600 and whether Line 1600 should be pressure tested or de-rated, and whether Line 3602 would be an inducement to gas export through Otay Mesa.		Verified
d. Intervenor’s claim of non-duplication: Sierra Club and SCGS were the only two parties to focus their resources exclusively on issues related to the need for Line 3602. Sierra Club coordinated with SCGC to avoid duplication of effort. Consistent with its organizational mission and expertise, Sierra Club provided a unique and additive environmental perspective on the need for Line 3602, which framed concerns around stranded asset risk at a time of rapid decarbonization and declining reliance on natural gas. Sierra Club’s analysis regarding the difference between redundancy and resiliency, which was a key justification for Line 3602, was also unique to this proceeding and adopted in the Commission’s decision. As indicated by multiple references to Sierra Club arguments in the Decision, Sierra Club’s contribution was unique and contributed to the Commission’s determination to reject Line 3602.		Noted

² The Office of Ratepayer Advocates (ORA) was renamed the Public Advocate’s Office at the California Public Utilities Commission (Cal Advocates), pursuant to Senate Bill No. 854, which Governor approved on June 27, 2018.

PART III: REASONABLENESS OF REQUESTED COMPENSATION:**A. General Claim of Reasonableness (§ 1801 and § 1806):**

	CPUC Discussion
<p>a. Intervenor’s claim of cost reasonableness: The Decision notes the estimated construction cost of Line 3602 would be \$639 million. Sierra Club’s contribution to this case through testimony, record development, and briefing, helped secure the rejection of this project and the corresponding \$2 billion the project would add to SoCalGas’ revenue requirement to be recovered from ratepayers through at least 2063.</p>	Noted
<p>b. Reasonableness of hours claimed: As the only environmental party in this proceeding, Sierra Club played a lead role in developing the case that Line 1600 was a stranded asset risk in a time of rapid decarbonization. Sierra Club’s hours include work from issuing and responding to multiple data requests, preparation of expert testimony, cross examination on highly technical issues that required significant preparation, briefing, and comments on the PD. Recorded hours are very close to the estimates Sierra Club made at the outset of the proceeding in its initial intervenor compensation notice.</p>	Noted
<p>c. Allocation of hours by issue: Need: 27% Reliability/Resiliency: 18% Alternatives: 29% Development Catalyst: 3% General: 23%</p> <p>The allocation of hours to “General” is relatively high in this request due to need to first understand the complications of case and to identify the most relevant issues. Additionally, Sierra Club devoted staff time in 2016 to researching the cost effectiveness and alternatives to Line 3602. These issues were later deferred to Phase 2, after the proceeding was divided into phases in the December 22, 2016 <i>Ruling Modifying Schedule</i>. Time spent on these issues not reflected in the Phase 1 Decision was categorized as “General.”</p>	Noted

B. Specific Claim:*

CLAIMED						CPUC AWARD		
ATTORNEY, EXPERT, AND ADVOCATE FEES								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate \$	Total \$
Matt Vespa	2015	5.3	\$330	D. 15-01-046	\$1,749	5.30	\$330.00	\$1,749.00
Matt Vespa	2016	65.3	\$350	D. 16-09-034	\$22,855	65.30	\$350.00	\$22,855.00
Matt Vespa	2017	278.5	\$380	D. 18-02-013	\$105,830	278.50	\$380.00	\$105,830.00
Matt Vespa	2018	36.1	\$390	[1]	\$14,079	36.10	\$390.00 [A]	\$14,079.00
Alison Seel	2015	10.7	\$190	D. 17-01-021	\$2,033	10.70	\$190.00	\$2,033.00
Alison Seel	2016	44.8	\$205	D. 17-01-021	\$9,184	44.80	\$205.00	\$9,184.00
Alison Seel	2017	124.1	\$210	[2]	\$26,061	124.10	\$210.00 [B]	\$26,061.00
Alison Seel	2018	19.4	\$240	[3]	\$4,656	19.40	\$240.00 [C]	\$4,656.00
James Caldwell	2017	67	\$400	[4]	\$26,800	67.00	\$400.00 [D]	\$26,800.00
Subtotal: \$213,247						Subtotal: \$213,247.00		
INTERVENOR COMPENSATION CLAIM PREPARATION **								
Item	Year	Hours	Rate \$	Basis for Rate*	Total \$	Hours	Rate	Total \$
Alison Seel	2016	2.2	\$100	½ Full Rate	\$220	2.20	\$102.50 [E]	\$225.50
Alison Seel	2018	6	\$120	½ Full Rate	\$720	6.00	\$120.00	\$720.00
Matt Vespa	2016	0.5	\$175	½ Full Rate	\$87	0.50	\$175.00	\$87.50 [F]
Matt Vespa	2018	5.9	\$195	½ Full Rate	\$1,150	5.90	\$195.00	\$1,150.50 [F]
Subtotal: \$2,177						Subtotal: \$2,183.50		
TOTAL REQUEST: \$215,424						TOTAL AWARD: \$215,430.50		
<p>*We remind all intervenors that Commission staff may audit the records and books of the intervenors to the extent necessary to verify the basis for the award (§1804(d)). Intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenors’s records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be</p>								

retained for at least three years from the date of the final decision making the award. **Travel and Reasonable Claim preparation time are typically compensated at ½ of preparer’s normal hourly rate			
ATTORNEY INFORMATION			
Attorney	Date Admitted to CA BAR ³	Member Number	Actions Affecting Eligibility (Yes/No?) If “Yes”, attach explanation
Matthew Vespa	2002	222265	No
Alison Seel	2014	300602	No

C. Attachments Documenting Specific Claim and Comments on Part III:

Attachment or Comment #	Description/Comment
Comment #1	The 2018 hourly rate for Matt Vespa reflects a 2.30% cost-of-living adjustment (COLA) to his approved 2017 rate of \$280, rounded to the nearest \$5 increment, as approved in Resolution ALJ-352.
Comment #2	The 2017 hourly rate for Alison Seel reflects a 2.14% COLA to her approved 2016 rate of \$205, rounded to the nearest \$5 increment, as approved in Resolution ALJ-345.
Comment #3	For hours billed in 2018, Ms. Seel is requesting a rate within the latest approved range for attorneys with 3-4 years of experience. Ms. Seel was admitted to the California Bar in December 2014.
Comment #4	Sierra Club seeks an hourly rate of \$400 for work performed in 2017 by first time representative James Caldwell. Sierra Club seeks a rate toward the higher end of the range approved in Resolution ALJ-345 for an expert with 13+ years’ experience, in light of Mr. Caldwell’s significant expertise. Mr. Caldwell has fifty years’ experience in issues related to energy production and public policy, beginning his career in 1965. He has published extensive peer-reviewed studies of California’s electricity grid and its low carbon future, and previously testified in California Energy Commission and California Public Utilities Commission proceedings, and before the Board of the California Independent System Operator. His resume is attached to this request as Attachment 1.
Attachment 1	Certificate of Service
Attachment 2	Resume for Jim Caldwell
Attachment 3	Time Sheets for Matt Vespa

³ This information may be obtained through the State Bar of California’s website at <http://members.calbar.ca.gov/fal/MemberSearch/QuickSearch> .

Attachment 4	Time Sheets for Alison Seel
Attachment 5	Time Sheets for Jim Caldwell
Attachment 6	Compilation Chart of Percentages of Time by Issue for All Attorneys/Experts

D. CPUC Comments, Disallowances, and Adjustments:

Item	Reason
[A]	Commission finds reasonable a rate of \$390.00 per hour for Vespa in 2018.
[B]	Commission finds reasonable a rate of \$210.00 per hour for Seel in 2017.
[C]	Commission finds reasonable a rate of \$240.00 per hour for Seel in 2018.
[D]	Commission finds reasonable a rate of \$400.00 per hour for Caldwell in 2017.
[E]	½ of the hourly rate in 2016 for Seel is \$102.50 per hour.
[F]	Mathematical Rounding Errors.

PART IV: OPPOSITIONS AND COMMENTS:

(Within 30 days after service of this Claim, Commission Staff or any other party may file a response to the Claim (*see* § 1804(c)))

A. Opposition: Did any party oppose the Claim?	No
B. Comment Period: Was the 30-day comment period waived (<i>see</i> Rule 14.6(c)(6))?	Yes

FINDINGS OF FACT

1. Sierra Club has made a substantial contribution to D.18-06-028.
2. The requested hourly rates for Sierra Club's representatives, as adjusted herein, are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses, as adjusted herein, are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is \$215,430.50.

CONCLUSION OF LAW

The Claim, with any adjustment set forth above, satisfies all requirements of Pub. Util. Code §§ 1801-1812.

ORDER

1. Sierra Club shall be awarded \$215,430.50.
2. Within 30 days of the effective date of this decision, San Diego Gas & Electric Company ratepayers and Southern California Gas Company ratepayers shall pay Sierra Club their respective shares of the award, based on their California-jurisdictional gas revenues for the 2017 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning November 1, 2018, the 75th day after the filing of Sierra Club's request, and continuing until full payment is made.
3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at Oxnard, California.

APPENDIX

Compensation Decision Summary Information

Compensation Decision:		Modifies Decision?	No
Contribution Decision(s):	D1806028		
Proceeding(s):	A.15-09-013		
Author:	ALJ Kersten		
Payer(s):	San Diego Gas & Electric Company ratepayers and Southern California Gas Company ratepayers.		

Intervenor Information

Intervenor	Date Claim Filed	Amount Requested	Amount Awarded	Multiplier?	Reason Change / Disallowance
Sierra Club	08/17/2018	\$215,424.00	\$215,430.50	N/A	Difference in hourly rate and rounding errors.

Hourly Fee Information

First Name	Last Name	Attorney, Expert, or Advocate	Hourly Fee Requested	Year Hourly Fee Requested	Hourly Fee Adopted
Matt	Vespa	Attorney	\$330.00	2015	\$330.00
Matt	Vespa	Attorney	\$350.00	2016	\$350.00
Matt	Vespa	Attorney	\$380.00	2017	\$380.00
Matt	Vespa	Attorney	\$390.00	2018	\$390.00
Alison	Seel	Attorney	\$190.00	2015	\$190.00
Alison	Seel	Attorney	\$205.00	2016	\$205.00
Alison	Seel	Attorney	\$210.00	2017	\$210.00
Alison	Seel	Attorney	\$240.00	2018	\$240.00
James	Caldwell	Expert	\$400.00	2017	\$400.00

(END OF APPENDIX)